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March 21, 2007

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VIA E-FILING

The Honorable Mary Pat Thynge United States District Court Federal Building 844 King Street Wilmington, Delaware 19801

Re: Vernette Walker v. The News Journal and Ann Hines

Civil Action No. 06-138-KAJ

Dear Judge Thynge:

The parties hereby submit the proposed Scheduling Order. Counsel for defendants and *pro se* plaintiff have discussed your form of Scheduling Order and have agreed to dates as set forth in the parties' proposal. There is one somewhat odd issue in the proposed Scheduling Order that I would like to bring to Your Honor's attention; specifically, the dates regarding expert disclosure and expert discovery. To save both parties potentially unnecessary expert fees and costs, I have proposed (to which plaintiff agrees) reserving expert disclosure and discovery for after a ruling on any case dispositive motions. However, I am uncertain as to whether the deadlines proposed for disclosure of expert testimony is too early in relation to obtaining a summary judgment decision from the Court. If so, these dates could be extended a month or even two months if Your Honor agrees.

Nonetheless, please feel free to let me know if Your Honor has any concerns.

Sinecrel

Jennifer C. Janffret

JCB/kdm

cc: Ms. Vernette Walker (via first class mail)
Peter T. Dalleo, Clerk (via hand delivery)

Steven J. Fineman, Esquire